



Charles M. Lizza

Phone: (973) 286-6715

Fax: (973) 286-6815

clizza@saul.com

www.saul.com

May 21, 2014

VIA ECF & FEDEX

The Honorable Madeline C. Arleo, U.S.M.J.
United States District Court
Martin Luther King, Jr. Federal Building
50 Walnut Street, Room 2060
Newark, New Jersey 07102

Re: Celgene Corporation v. Natco Pharma Limited, et al.
Civil Action No. 10-5197 (SDW)(MCA)

Dear Judge Arleo:

This firm, together with Quinn Emanuel Urquhart & Sullivan, LLP, Jones Day, and Richard G. Greco PC, represents Plaintiff Celgene Corporation ("Celgene") in the above-referenced matter.

Pursuant to Local Patent Rule 3.7, Celgene respectfully requests leave to amend its infringement contentions and responses to invalidity contentions. We have conferred with Defendants' counsel regarding the proposed amendments and have been informed that Defendants have no objection. Celgene respectfully submits that it should be permitted leave to amend its contentions for at least the following reasons: *First*, Celgene's request is timely because the amendments are based on Defendants' recent production of additional documents. *Second*, there is good cause because Celgene was diligent in its efforts to discover this material and promptly raised these amendments with Defendants. *Third*, there is no prejudice to Defendants because they do not object to this request and the case schedule will not be affected. Accordingly, Celgene respectfully requests leave to amend its infringement contentions and responses to Defendants' invalidity contentions as shown in the attached redlines.¹ If this meets with the Court's approval, we respectfully request that Your Honor sign and enter the below form of endorsement.

¹ Because Celgene's proposed amended contentions have been designated under the Discovery Confidentiality Order in this case, they are not being publicly filed with this letter. However, Celgene will provide hard copies of its proposed amended contentions to the Court via overnight delivery with this letter.

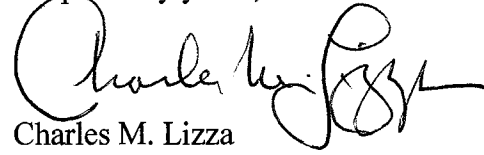
Hon. Madeline C. Arleo, U.S.M.J.

May 21, 2014

Page 2

Thank you for Your Honor's kind attention to this matter.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Charles M. Lizza", with a stylized flourish at the end.

Charles M. Lizza

Encls. (via FedEx only)

cc: All counsel (via e-mail)

SO ORDERED:

Hon. Madeline C. Arleo, U.S.M.J.